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Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-third session
Geneva, 25 June-4 July 2018
Item 6 (c) of the provisional agenda
Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: Portable tanks

Additional provisions applicable to the transport of Class 8 substances in portable tanks

Transmitted by the expert from Canada*

Background

1. Sub-section 4.2.1.17.1 of the Model Regulations requires pressure-relief devices of portable tanks used for Class 8 substances to also be inspected at intervals not exceeding one year.

2. As currently written, sub-section 4.2.1.17.1 does not clearly state the manner in which one is expected to inspect the pressure-relief devices, resulting in different portable tank facilities conducting different types of inspections on the pressure-relief devices of portable tanks used for Class 8 substances.

3. In Canada, we are being asked by some portable tank facilities whether or not a visual inspection alone would meet the requirements of sub-section 4.2.1.17.1; meanwhile, other facilities are functioning the pressure-relief devices, where applicable, to demonstrate proper operation.

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14).

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4. In an attempt to clarify this requirement, the expert from Canada proposes the changes below to promote a common understanding when it comes to the inspection of the pressure-relief devices.

Proposal

5. The inspection in sub-section 4.2.1.17.1 should refer to sub-section 6.7.2.19.8(e), which is an internal and external visual examination and only requires remote closure devices and self-closing stop-valves to be functioned to demonstrate proper operation.

"6.7.2.19.8 The internal and external examination shall ensure that:

(e) All emergency devices and valves are free from corrosion, distortion and any damage or defect that could prevent their normal operation. Remote closure devices and self-closing stop-valves shall be operated to demonstrate proper operation;".

6. Amend 4.2.1.17.1 to read as follows (new text underlined):

"4.2.1.17.1 Pressure-relief devices of portable tanks used for the transport of Class 8 substances shall be inspected at intervals not exceeding one year in accordance with 6.7.2.19.8(e)."